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November 6, 1998

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Via Hand Delivery
Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
Washington, D.C. 20554

NOV - 6 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Response to Data Request in CC Docket No. 97-160

Dear Secretary Salas:

Attached, pursuant to the Commission's August 7, 1998 Order and the Bureau's October 6, 1998 Order (DA 98-2014) in the above captioned docket, and pursuant to Roseville Telephone Company's (Roseville) Motion for Extension of Time and Modification of Data Response Requirement, please find data provided by Roseville Telephone Company with certain confidential data expurgated. As specified in its Motion, Roseville is supplying the Commission with Charts 2 and 3 of the requested data.

In accordance with the Filing Procedures established in the Order, Roseville is submitting two paper and two computer formatted copies of the expurgated data to Sheryl Todd of the Accounting Policy Division, a single paper and computer formatted copy of the expurgated data to the Commission's copy contractor, ITS, and a complete set of the data, including confidential data, to Bryan Clopton of the Accounting Policy Division.

Any correspondence regarding this filing may be directed to the undersigned.

Respectfully submitted,



Paul J. Feldman
Counsel for Roseville Telephone Company

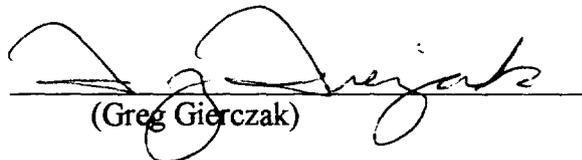
cc: Katie King, Accounting Policy Division
Bryan Clopton, Accounting Policy Division

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List A B C D E

DESIGNATION OF CONFIDENTIAL INFORMATION

I hereby certify that the information designated as confidential in the attached response(s) to the Revenue Benchmark Data Request is protected by Roseville Telephone Company (name of company) as confidential or financial information:

SIGNATURE:



(Greg Gierczak)

TITLE:

Executive Director, Regulatory

ADDRESS:

211 Lincoln Street

Roseville, CA 95678

TELEPHONE:

916-786-1440

FAX:

916-786-1805

On a separate sheet of paper, please list the responses designated confidential, by chart number and column letter, a statement of the reasons for withholding the information from the public record, and the facts on which those reasons are based.

DESIGNATION OF CONFIDENTIAL INFORMATION

Roseville Telephone Co. wishes to designate the following areas of Charts 2 & 3 as confidential:

Chart 2

Line 22 Columns B, C & D

Line 23 Columns B, C & D

Line 25 Columns C, D & E

Line 26 & 27 Columns C, D & E

Chart 3

Line 29 Columns B, C & D

Line 30 Columns B, C & D

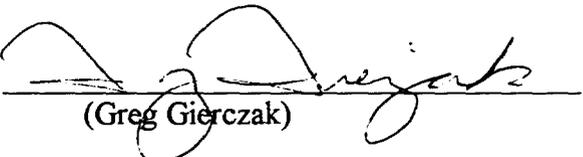
Line 32 Columns C, D & E

Line 33 & 34 Columns C, D & E

Roseville considers any detail of revenues and usage by class of customer to be market sensitive and proprietary. Roseville believes this data could be used by other parties to ultimately identify specific market criteria for developing competitive market plans.

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SIGNATURE: 
(Greg Gierczak)

TITLE: Executive Director, Regulatory

ADDRESS: 211 Lincoln Street
Roseville, CA 95678

TELEPHONE: 916-786-1440

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Line 25 Columns C, D & E

Line 26 & 27 Columns C, D & E

Chart 3

Line 29 Columns B, C & D

Line 30 Columns B, C & D

Line 32 Columns C, D & E

Line 33 & 34 Columns C, D & E

Roseville considers any detail of revenues and usage by class of customer to be market sensitive and proprietary. Roseville believes this data could be used by other parties to ultimately identify specific market criteria for developing competitive market plans.

Revenue Benchmark Data Request

Approved by OMB

3060-0842

Expires 02/28/1999

Estimated Average Burden Per Response: 250 Hours

Notice to Individuals: Pursuant to Congress's directive in the Telecommunications Act of 1996 that the Commission establish support mechanisms to ensure the delivery of affordable telecommunication service to all Americans, the Commission determined on May 8, 1997 that universal service support for rural, insular, and high cost areas should be based on forward-looking economic costs. As part of the forward-looking economic cost methodology, the Commission determined that it would select two revenue benchmarks to calculate the amount of federal universal service support that eligible non-rural carriers should receive. The data request solicits information from non-rural local exchange carriers to calculate the revenue benchmarks that will determine the level of universal service support. Your response is mandatory. 47 C.F.R. §§ 0.91 and 0.291.

This data request will be used to assist the Commission in implementing the forward-looking economic cost methodology used to estimate the amount of universal service support that will be provided to eligible non-rural carriers beginning July 1, 1999.

An agency may not conduct or sponsor and a person is not required to respond to a collection of information unless it displays a currently valid control number. The control number assigned to this collection is 3060-0842.

We have estimated that each response to this collection of information will take, on average, 250 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Washington, D.C. 20554, Paperwork Reduction Project (3060-0842). We also will accept your comments via the Internet if you send them to jboley@fcc.gov. Please **DO NOT SEND COMPLETED RESPONSES TO THIS ADDRESS**.

CERTIFICATION

I certify that I have been designated by the Company to attest to the accuracy of the information contained herein and that I have examined the foregoing and that to the best of my knowledge, information, and belief, all statements of fact contained in this report are an accurate statement of the affairs of the respondent with respect to the data and information set forth herein.

Printed Name: Linda Lupton

Telephone Number: (916) 786-1677

Position: Manager - Regulatory

Holding Company and Code:

Study Area and Code: 542334

Revenue Benchmark Data Request

CHART 2: INTERSTATE SWITCHED ACCESS REVENUES FOR JULY 1998

For each class of customer (residential, single-line business, and multi-line business), please provide total interstate switched access revenues for July 1998 received through: flat-rated charges to interexchange carriers based on the number of presubscribed lines, i.e., presubscribed interexchange carrier charges (PICCs); per-minute charges, including common line, switching and transport charges that are recovered on the basis of a per-minute charge; and per-call charges. In addition, please provide the total interstate access revenues for July 1998 received through flat-rated carrier-to-carrier charges.

For July 1998, please undertake a special study, if necessary, to determine the total number of interstate switched originating and terminating access minutes. In addition to total interstate switched access minutes, determine the number of such minutes originated and terminated by each class of customer (residential, single-line business, and multi-line business). Also, please include the average number of residential, single-line business and multi-line business switched lines in service during the study period, where the average is calculated by taking the simple average of the number of lines in service at the beginning of the study period and the number of lines in service at the end of the period.

	A	B	C	D	E	F
		Residential revenues	Single-line business revenues	Multi-line business revenues	Total revenues	Total calls or minutes
21	Flat-rated charges to IXCs based on number of presubscribed lines	N/A	N/A	N/A	N/A	
22	Per-minute charges				\$842	21,428
23	Per-call charges				\$19	1,634
24	Other IXC carrier-to-carrier flat-rated charges (excluding special access and IXC flat-rated charges based on number of presubscribed				\$3	
			Single-line Residential minutes or lines	Multi-line business minutes or lines	Multi-line business minutes or lines	Total minutes
25	Originating Minutes					12,889
26	Terminating Minutes					8,539
27	Average Lines In Service					

Revenue Benchmark Data Request

CHART 3: INTRASTATE SWITCHED ACCESS REVENUES FOR JULY 1998

For each class of customer (residential, single-line business, and multi-line business), please provide total intrastate switched access revenues for July 1998 received through: flat-rated charges to interexchange carriers based on the number of presubscribed lines, such as, presubscribed interexchange carrier charges (PICCs); per-minute charges, including common line, switching and transport charges that are recovered on the basis of a per-minute charge; and per-call charges. In addition, please provide the total intrastate access revenues for July 1998 received through flat-rated carrier-to-carrier charges.

For July 1998, please undertake a special study, if necessary, to determine total number of intrastate switched originating and terminating access minutes. In addition to total intrastate switched access minutes, determine the number of such minutes originated and terminated by each class of customer (residential, single-line business, and multi-line business). Also, please include the average number of residential, single-line business and multi-line business switched lines in service during the study period, where the average is calculated by taking the simple average of the number of lines in service at the beginning of the study period and the number of lines in service at the end of the period.

	A	B	C	D	E	F
		Residential revenues	Single-line business revenues	Multi-line business revenues	Total revenues	Total calls or minutes
28	Flat-rated charges to IXCs based on number of presubscribed lines	N/A	N/A	N/A	N/A	
29	Per-minute charges				\$1,148	36,733
30	Per-call charges				\$16	3,526
31	(excluding special access and IXC flat-rated charges based on number of presubscribed lines)				\$5	
			Residential minutes or lines	Single-line business minutes or lines	Multi-line business minutes or lines	Total minutes
32	Originating Minutes					18,673
33	Terminating Minutes					18,060
34	Average Lines In Service					

Revenue Benchmark Data Request

Footnotes

No.	Text	Rows	Columns
1	All revenues in Chart I represent booked revenue.	1,6,11,16	B,C,D
2	Historical business revenues are not available separated by single-line and multi-line. The amount on Row 6 represents total business for both single and multi-line.	6	B,C,D
3	Taxes and surcharges not included in total revenue.	2,7,12,17	B,C,D
4	Intralata toll is not provided by Roseville Telephone Company or any of it's affiliates.	3,8,13,18	B,C,D
5	Local service bill quantities not available separated by residential, single-line business and multi-line business. The amount on Row 19 represents the total.	4,9,14,19	B,C,D
6	Historical revenues on Row 6 will be factored between single-line and multi-line (Row 11) based on current period after completion of Chart 4 (December 7, 1998).	6,11	B,C,D
7	Roseville is not a price cap company and therefore, not required to charge IXCs the flat rated charges based on number of pre-subscribed lines.	21,28	B,C,D,E
8	Charts 2 & 3 have been updated to reflect revenue separately for residential, single-line business and multi-line business.	22,23,29 30	B,C,D
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10	All data for Charts 4 and 5 will be provided by December 7, 1998.	35 thru 82	B thru H

Revenue Benchmark Data Request

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o Microfilm, microform, certain photographs or videotape.

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